

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**FILED**

AUG 19 2016

CLERK, US DISTRICT COURT  
NORFOLK, VA

R.M.S. TITANIC, INC.,  
successor in interest to Titanic  
Ventures, limited partnership,

Plaintiff,

v.

The Wrecked and Abandoned  
Vessel, . . .believed to be  
the RMS TITANIC, in rem,

Defendant.

CIVIL ACTION NO: 2:93-CV-902

**NOTICE OF FILING MOTION TO SEAL**

NOW COMES Plaintiff R.M.S. Titanic, Inc., by and through counsel, and pursuant to Rule 5(C) of the Rules of the United States District Court for the Eastern District of Virginia, hereby give notice of filing under seal the unredacted version of Exhibit 1 to the Periodic Report of R.M.S. Titanic, Inc. on the Progress of Research and Recovery Operations.

Any party or non-party may submit a memorandum in support of or in opposition to the motion to seal within seven (7) days after the filing of the motion to seal. Any person objecting to the motion must file an objection with the Clerk within seven (7) days after the filing of the motion to seal. If no objection is filed in a timely manner, the Court may treat the motion as uncontested.

Respectfully submitted,

R.M.S. TITANIC, INC.

By Counsel

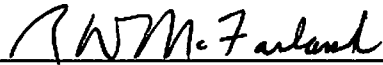
Counsel:

  
Robert W. McFarland (VSB #24021)  
McGuireWoods LLP  
9000 World Trade Center  
Norfolk, VA 23510  
Tele: 757/640-3716  
Fax: 757/640-3966  
Email: rmcfarland@mcguirewoods.com

Brian A. Wainger (VSB #38476)  
Kaleo Legal  
4456 Corporation Lane, Suite 135  
Virginia Beach, VA 23462  
Tele: 757/965-6804  
Fax: 757/304-6175  
Email: bwainger@kaleolegal.com

CERTIFICATION

I hereby certify that a copy of the foregoing has been delivered this day to Kent Porter, Esq., U.S. Attorney's Office, 8000 World Trade Center, Norfolk, VA 23510, this 17<sup>th</sup> day of August, 2016.



Robert W. McFarland (VSB #24021)  
McGuireWoods LLP  
9000 World Trade Center  
Norfolk, VA 23510  
Tele: 757/640-3716  
Fax: 757/640-3966  
Email: rmcfarland@mcguirewoods.com